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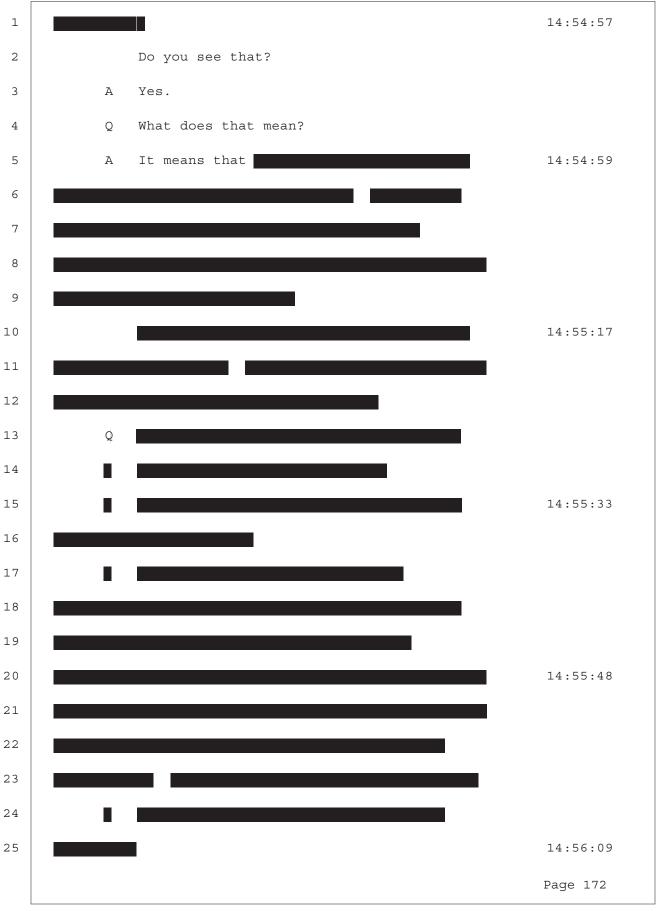
Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 2 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

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1
                UNITED STATES DISTRICT COURT
               NORTHERN DISTRICT OF CALIFORNIA
 2
 3
                   SAN FRANCISCO DIVISION
4
5
     WAYMO LLC,
                                   )
                 Plaintiff,
6
7
                                   ) Case No.
             VS.
    UBER TECHNOLOGIES, INC.; ) 3:17-cv-000939-WHA
8
9
     OTTOMOTTO LLC; OTTO TRUCKING, )
10
     INC.,
11
                  Defendants.
12
        HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
13
14
15
       VIDEOTAPED DEPOSITION OF KRISTINN GUDJONSSON
16
                   Palo Alto, California
17
                   Friday, July 28, 2017
18
                          Volume I
19
20
    Reported by:
21
    CARLA SOARES
    CSR No. 5908
22
23
    JOB No. 2665814
24
    PAGES 1 - 242
25
                                                 Page 1
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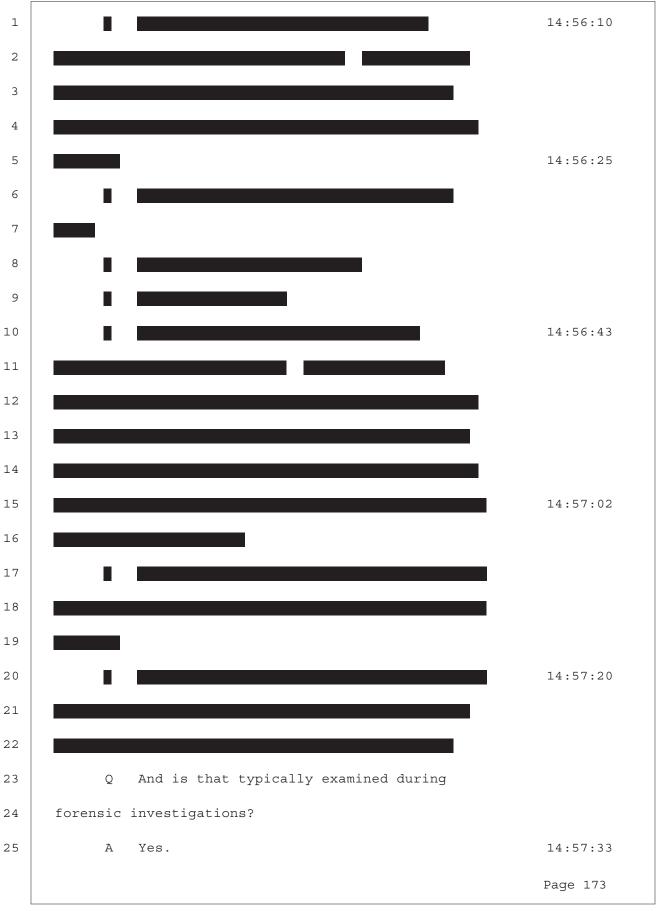
Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 3 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1	BY MR. TAKASHIMA:	11:13:08
2	Q Do you understand that what used to be	
3	Project Chauffeur has become Waymo?	
4	A Yes.	
5	Q If I use the term "Waymo," will you	11:13:13
6	understand that to include Project Chauffeur before?	
7	A Yes.	
8	MR. BAKER: Let me just clarify, also,	
9	Counsel, for the record, that my previous objections	
10	were attorney-client privilege and work product.	11:13:22
11	MR. TAKASHIMA: Thank you.	
12	Q Was the investigation of Anthony	
13	Levandowski	
14	?	
15	MR. BAKER: You can answer that yes or no.	11:13:52
16	THE WITNESS: Yes.	
17	BY MR. TAKASHIMA:	
18	Q Are you aware of any investigations of	
19		
20	?	11:14:08
21	MR. BAKER: You can answer that yes or no.	
22	THE WITNESS: No.	
23	BY MR. TAKASHIMA:	
24	Q What was your first involvement in the	
25	investigation of Anthony Levandowski?	11:14:22
		Page 48

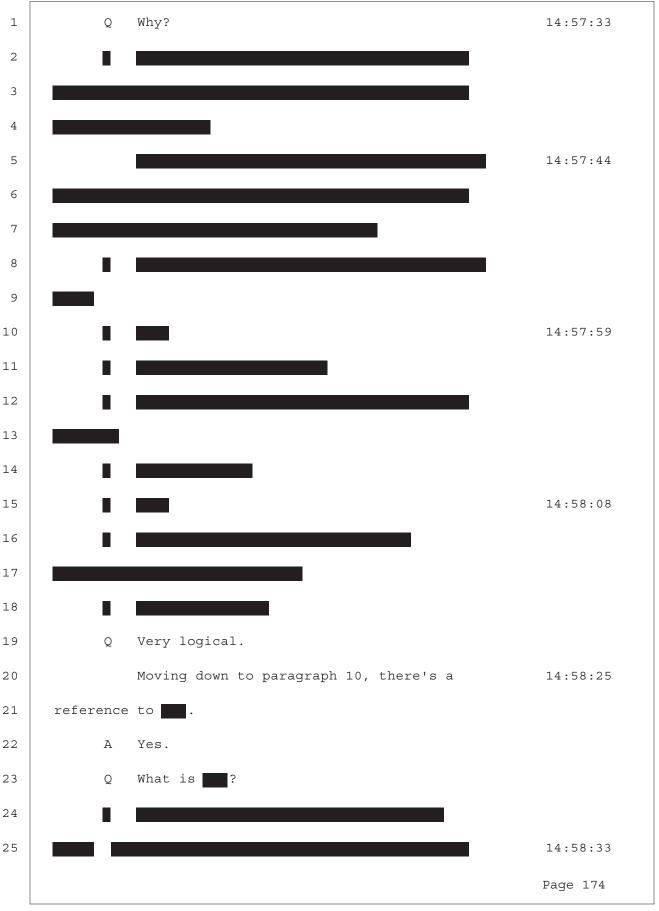
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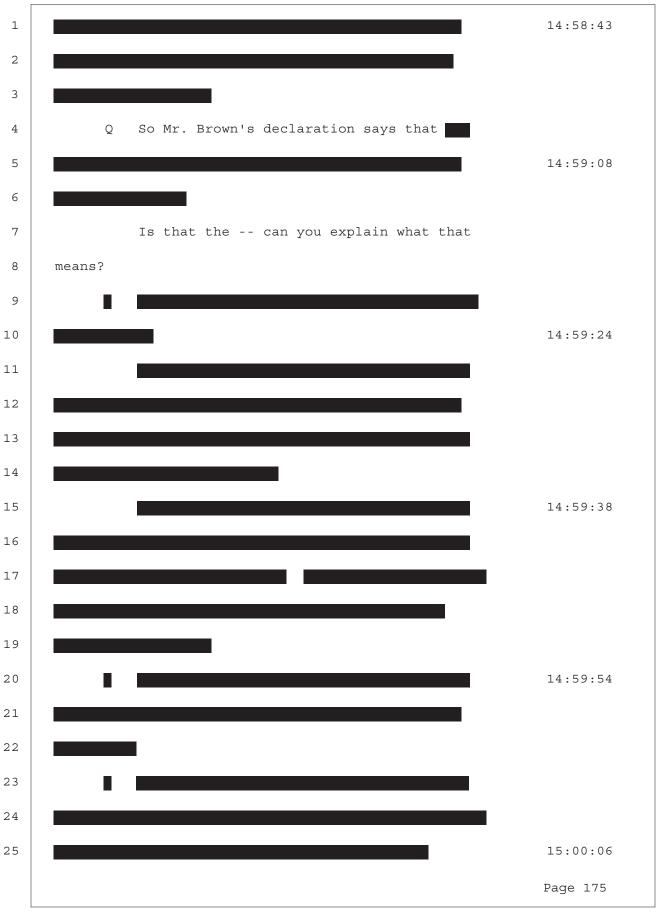
Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 5 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY



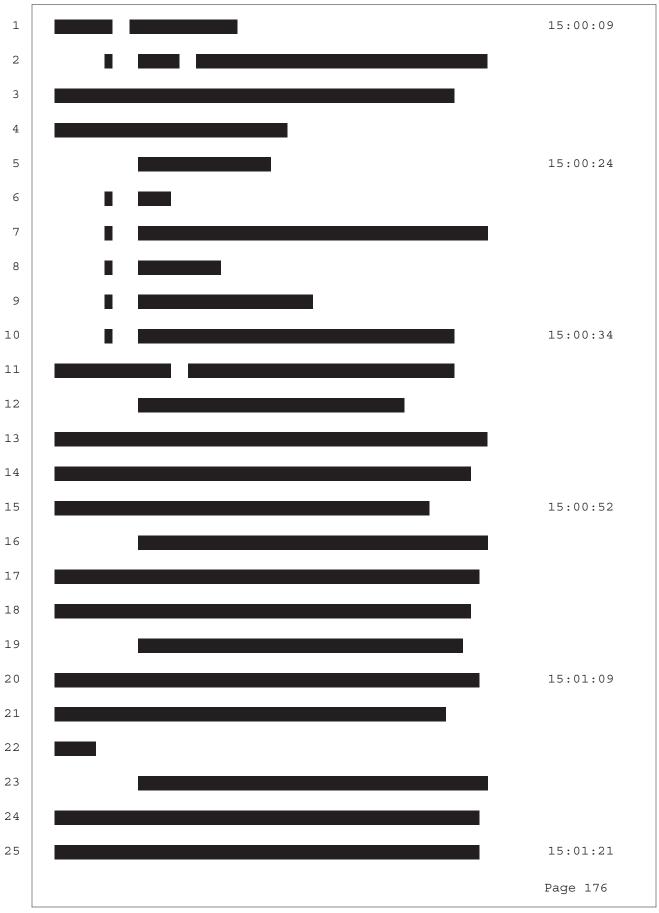
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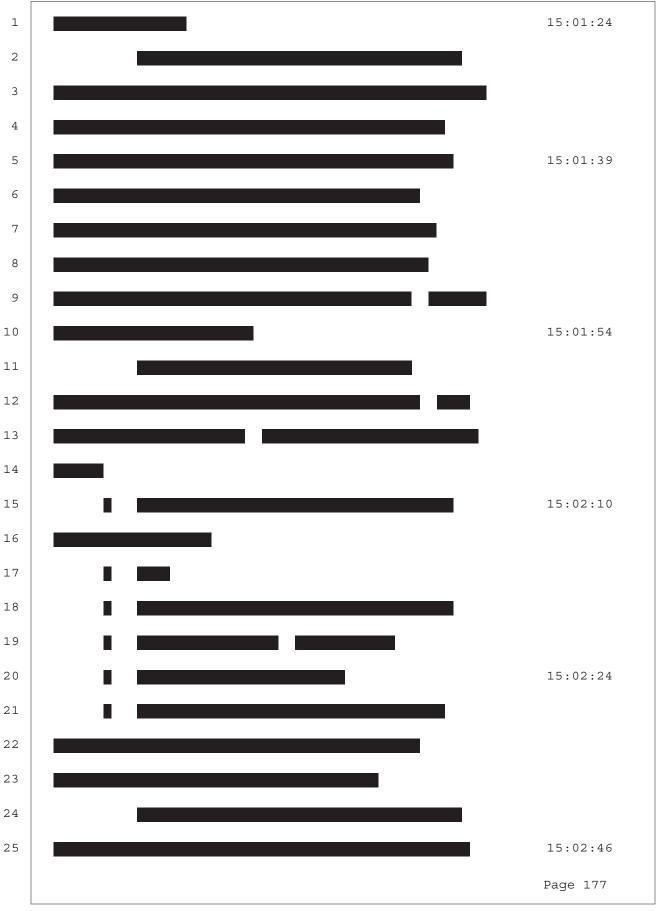
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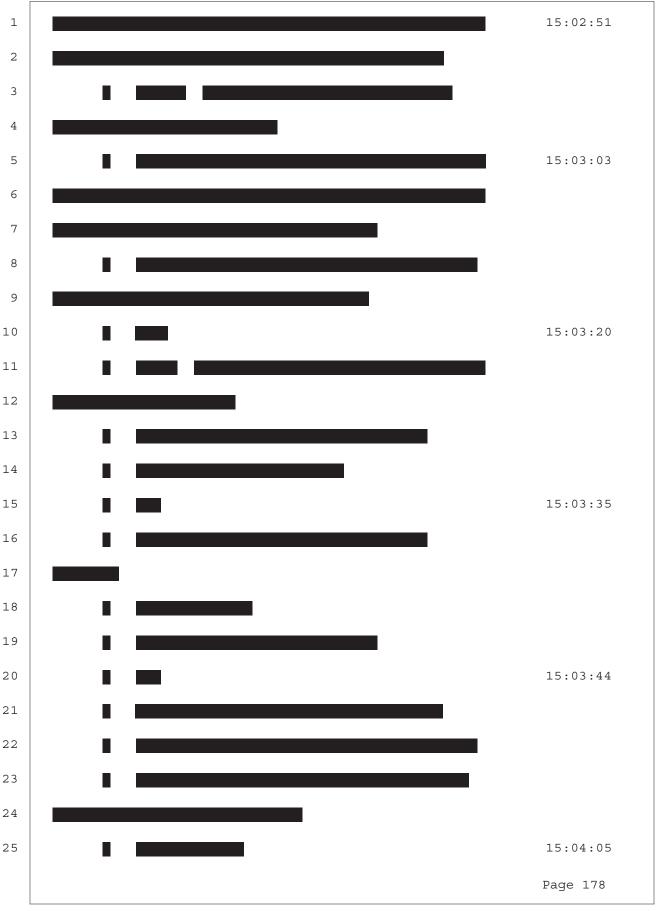
Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 8 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY



Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 9 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY



Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 10 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY



Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 11 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1	today, you are not aware of any evidence that	15:29:57
2	Mr. Levandowski copied files off the computer before	
3	it was reimaged?	
4	MR. BAKER: Objection to form.	
5	THE WITNESS: I can only tell you what's	15:30:06
6	in the declaration here, what we see here.	
7	BY MR. TAKASHIMA:	
8	Q To your knowledge, has there been any	
9	investigation of Mr. Levandowski's e-mail account at	
10	Google?	15:30:53
11	A I'm not sure.	
12	Q To your knowledge, has anybody connected	
13	with an investigation reviewed the contents of	
14	Mr. Levandowski's e-mail account at Google?	
15	A I'm not sure.	15:31:05
16	Q Who would know?	
17	A Lawyers.	
18	Q Would anybody else in digital forensics	
19	know?	
20	A Potentially, but probably not. It	15:31:22
21	probably would have been me if that check was made.	
22	Q Have you conducted been involved in any	
23	review of Mr. Levandowski's workstation from Google?	
24	A The workstation, no.	
25	Q Has anybody else from digital forensics	15:31:42
		Page 198

Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 12 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1	conducted that investigation?	15:31:44
2	A No.	
3	Q Has anybody looked at Mr. Levandowski's	
4	workstation?	
5	A Not to my knowledge.	15:31:49
6	Q Has the workstation been preserved?	
7	A Not to my knowledge.	
8	Q Okay. Has it been deleted?	
9	A I'm not sure. I would have to go check.	
10	Q Did you ever discuss with anybody	15:32:07
11	investigating Mr. Levandowski's workstation?	
12	MR. BAKER: Again, I just want to caution	
13	the witness not to disclose any communications that	
14	he's had with attorneys.	
15	If you have a question, we can go outside.	15:32:22
16	MR. TAKASHIMA: Do you want to take a	
17	break?	
18	THE WITNESS: Yes. Let's do that.	
19	THE VIDEO OPERATOR: We are now going off	
20	the record, and the time is 3:32.	15:32:31
21	(Recess, 3:32 p.m 3:39 p.m.)	
22	THE VIDEO OPERATOR: We're now going back	
23	on the record, and the time is 3:39.	
24	BY MR. TAKASHIMA:	
25	Q Did you ever discuss with anybody whether	15:39:05
		Page 199

Case 3:17-cv-00939-WHA Document 1524-29 Filed 09/12/17 Page 13 of 13 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

1	I, the undersigned, a Certified Shorthand
2	Reporter of the State of California, do hereby
3	certify:
4	That the foregoing proceedings were taken
5	before me at the time and place herein set forth;
6	that any witnesses in the foregoing proceedings,
7	prior to testifying, were administered an oath; that
8	a record of the proceedings was made by me using
9	machine shorthand which was thereafter transcribed
10	under my direction; that the foregoing transcript is
11	a true record of the testimony given.
12	Further, that if the foregoing pertains to
13	the original transcript of a deposition in a Federal
14	Case, before completion of the proceedings, review
15	of the transcript [] was [X] was not requested.
16	I further certify I am neither financially
17	interested in the action nor a relative or employee
18	of any attorney or any party to this action.
19	IN WITNESS WHEREOF, I have this date
20	subscribed my name.
21	Dated: 7/29/2017
22	
23	Carla Soares
24	CARLA SOARES
25	CSR No. 5908
	Page 242